

EXHIBIT 16

FILED

March 12, 2020
TAMARA CHARLES
CLERK OF THE COURT

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

TER OF THE ESTATE)
OF JEFFREY E. EPSTEIN,)
Deceased.)
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)

PROBATE NO. ST-19-PB-80

ACTION FOR TESTATE
ADMINISTRATION

RECEIVED
ST. JOHN
JUL 25 2023
10:00 AM
CLERK OF COURT

CREDITOR'S CLAIM FOR UNLIQUIDATED DAMAGES

Claimant Jane Doe 981 presents and files this Creditor's Claim for unliquidated damages against the Estate of Jeffrey E. Epstein ("Estate"):

1. Claimant's claim for unliquidated damages arises out of Jeffrey E. Epstein's sexual assault, sexual abuse and battery of Claimant.
2. Beginning in 2004, and continuing for years thereafter, Epstein trafficked, assaulted, and abused Claimant at his homes in New York and the U.S. Virgin Islands, causing Claimant severe physical and emotional trauma and distress.
3. Claimant has a right to money damages, whether in form of a judgment or liquidated damages, and has an equitable lien on all unencumbered assets of the Estate.
4. Claimant's claims for sexual assault, battery and intentional infliction of emotional distress are timely. New York law provides that a plaintiff shall have at least one year from the termination of a criminal action against the same defendant to bring a civil action based on the same facts or occurrences as the criminal action. *See* NY CPLR § 215(8)(a). A criminal action against Epstein was terminated on August 29, 2019. A claim under Virgin Islands law is also timely under the doctrine of equitable tolling.
5. This Claim is verified by the Affidavit of Claimant, which is attached as Exhibit 1.

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The Affidavit is redacted to conceal the identity of Claimant at this time.

6. Claimant moves this Court to permit her to proceed by pseudonym at this point in the proceedings.

WHEREFORE, Claimant Jane Doe 981 asks this Court to enter judgment against the Estate in an amount sufficient to compensate her for her injuries, along with interest, attorney's fees and punitive damages.

DATED: March 12, 2020

By:



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 12, 2020, I caused a true and correct copy of the foregoing document to be sent to the following via U.S. Mail and via email.

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Marina Leonard

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

IN THE MATTER OF THE ESTATE OF)
) PROBATE NO. ST-19-PB-80
JEFFREY E. EPSTEIN,)
)
Deceased)
_____)

AFFIDAVIT OF JANE DOE 981

I, _____ aka Jane Doe 981, being first duly sworn on oath, depose and say:

1. I have reviewed my Creditor's Claim for Unliquidated Damages against the Estate of Jeffrey E. Epstein in which I am identified as Jane Doe 981. The facts set forth therein are true and correct to the best of my knowledge.
2. Although unliquidated at this time, compensation for my claim is due from the Estate of Jeffrey E. Epstein. No payments have been made thereon, and no counterclaim has been filed to my knowledge.
3. I will submit a detailed Affidavit at such time as this Court permits me to proceed as Jane Doe 981. The Affidavit will present the factual details in support of my Creditor's Claim for Unliquidated Damages in this case.

Further the Affiant sayeth not.

I have read the foregoing affidavit which consists of one (1) page, including this page. I swear that the foregoing affidavit is true and correct to the best of my information, knowledge, and belief. This affidavit is signed on 11 day of March 2020 in Beverly Hills, California under oath and penalty of perjury of the laws of the United States.

Jane Doe 981

Jane Doe 981, Affiant/Claimant

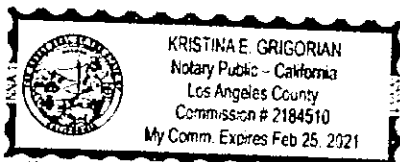
Affiant/Claimant

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Los Angeles

Subscribed and sworn to (~~or affirmed~~) before me on this 11th
day of March, 2020, by [REDACTED]

proved to me on the basis of satisfactory evidence to be the
person(~~s~~) who appeared before me.



(Seal)

Signature

A handwritten signature in cursive script, appearing to read "Kristina E. Grigorian", written over a horizontal line.